

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-HARVARD
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS AT NEW
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-AMERICAN
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT
OF STATE,

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, and the
DEPARTMENT OF HOMELAND
SECURITY,

TODD LYONS, in his official capacity as
Acting Director of U.S. Immigration and
Customs Enforcement,

DONALD J. TRUMP, in his official capacity
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants.

Civil Action No. 1:25-cv-10685-WGY

DECLARATION OF NOAM BIALE FOR LEAVE TO APPEAR PRO HAC VICE

Pursuant to Local Rule 83.5.3, I, Noam Biale, submit this certificate in support of my application, on motion of Edwina Clarke, for leave to appear and practice in this Court in the above-captioned case.

1. I am a member of the bar in good standing in every jurisdiction where I am admitted to practice. I was admitted to the New York Bar in 2012 and am a member in good standing. I am also a member in good standing of the bars of United States Supreme Court; the United States Court of Appeals for the Second Circuit; the Northern, Southern, and Eastern Districts of New York; the U.S. District Court for the District of Columbia; and the District of Connecticut.

2. There are no disciplinary proceedings pending against me in any jurisdiction.

3. I have not had any previous admission for a limited purpose or admission *pro hac vice* to this Court revoked for misconduct.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts and agree to comply with them.

5. Edwina Clarke at Zimmer, Citron & Clarke, LLP, a member in good standing of the bar of this Court, is also counsel of record in this case.

I certify under penalty of perjury that the foregoing is true and correct.

Executed May 5, 2025
New York, New York

/s/ Noam Biale
Noam Biale